

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS, INC.,)
)
)
Plaintiff,)
)
v.) Civil Action No. 3:09-cv-620
)
LAWSON SOFTWARE, INC.)
)
)
Defendant.)

**DEFENDANT LAWSON SOFTWARE, INC.'S
DESIGNATED DISCOVERY FOR CONTEMPT PROCEEDINGS**

Pursuant to Federal Rules of Civil Procedure 32 and 33(c) and the Scheduling Order Concerning Contempt Proceedings, Defendant Lawson Software, Inc. (“Lawson” or “Defendant”), by and through its attorneys, hereby designates the following discovery for the contempt proceedings:

1. Lawson’s affirmative designations and corresponding summary of the January 9, 2012 deposition of Kurt Reasoner (“Reasoner deposition”). This appendix also includes (i) ePlus’s fairness designations to the Reasoner deposition; (ii) Lawson’s counter designations to the Reasoner deposition; and (iii) an annotated copy of the Reasoner deposition transcript showing the respective affirmative designations of Lawson (blue), fairness (green) and rebuttal (orange) designations of ePlus, and counter designations of Lawson (purple), as well as all unresolved objections to those designations.¹

¹ ePlus incorrectly states that Lawson’s objections to ePlus’s affirmative designations were resolved during the parties’ meet-and-confer on February 22, 2012. This is incorrect. Lawson has one objection remaining that is annotated here. Lawson further believes that it has withdrawn and therefore resolved all objections listed by ePlus in its designations. The parties resolved ePlus’s and Lawson’s objections to their respective summaries of the Reasoner depositions during the parties’ meet-and-confer.

CERTIFICATE OF SERVICE

I certify that on this 23rd day of February, 2012, a true copy of the foregoing will be filed electronically with the Clerk of Court using the CM/ECF system, which will send a notification of such filing (NEF) to the following:

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